

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
FTX TRADING LTD., <i>et al.</i> , ¹)	Case No. 22-11068 (JTD)
)	
Debtors.)	(Lead Case)
)	
)	(Jointly Administered)
)	

**DECLARATION OF MATTHEW C. ZIEGLER
REGARDING THE CHANGE IN HOURLY RATES OF MORGAN, LEWIS &
BOCKIUS LLP, COUNSEL TO EMERGENT FIDELITY TECHNOLOGIES LTD**

Matthew C. Ziegler, pursuant to 28 U.S.C. § 1746, hereby declares under penalty of perjury as follows:

1. I am over 18 years of age and competent to testify to the matters herein.
2. I am a partner at the law firm Morgan, Lewis & Bockius LLP ("Morgan Lewis") with offices located at 2222 Market Street, Philadelphia, PA 19103. I am in good standing before the courts in which I am admitted, and I have not been disbarred, suspended, or disciplined by any court or administrative body.
3. I am authorized to submit this declaration (the "Declaration") on behalf of Emergent Fidelity Technologies Ltd (the "Emergent Debtor") in Case No. 23-10149 (JTD). The Emergent Debtor is a chapter 11 debtor in this Court, whose case is jointly administered with the chapter 11 cases of FTX, *In re FTX Trading, Ltd., et. al.*, Case No. 22-11068 (JTD).² The

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

² D.I. 91, Case No. 23-10149; D.I. 1469, Case No. 22-11068.

information contained in this Declaration is based on my personal knowledge and my review of the files related to the Emergent Debtor.

4. On April 10, 2023, this Court authorized the Emergent Debtor to retain and employ Morgan Lewis as bankruptcy counsel, effective as of the Emergent Debtor's February 3, 2023 petition date, in its *Order Authorizing the Retention and Employment of Morgan, Lewis & Bockius LLP as Attorneys for the Debtor Effective as of the Petition Date* [D.I. 90, Case No. 23-10149 (JTD)] (the "Retention Order"). Pursuant to paragraph 7 of the Retention Order, "Morgan Lewis shall file a supplemental declaration . . . which . . . shall explain the basis for the requested rate increases in accordance with section 330(a)(3)(F) of the Bankruptcy Code and state whether the Debtor has consented to the rate increase."

5. In accordance with ordinary practice, the billing rates for Morgan Lewis have changed effective as of January 1, 2024. The changes are consistent with Morgan Lewis's billing rate increases firmwide. Morgan Lewis's billing rates that took effect on January 1, 2024 range as follows:

Timekeeper Category	U.S. Hourly Rate Range
Partners	\$1,075 – \$1,950
Of Counsel	\$1,050 – \$1,195
Associates	\$665 – \$1,015
Paraprofessionals	\$410 – \$440

6. The Joint Liquidators of the Emergent Debtor have consented to the rate increases.

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Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 10, 2024
Philadelphia, PA

Respectfully submitted,

/s/ Matthew C. Ziegler

Matthew C. Ziegler

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